

BILL OF COMPLAINT

John T. Carey and Eva V. Carey,
his wife,

vs.

Frank C. Beachley and Harry K. Beachley,
and all persons having, or claiming to
have any interest in the property known
as Lots Number 88, 104 and 109, in New
Addition, Brunswick, Frederick County,
Maryland; and James H. Falk, County
Treasurer for Frederick County, Maryland.

No. 16917 Equity

In The Circuit Court

For Frederick County,

Maryland, In Equity

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TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of John T. Carey and Eva V. Carey, his wife, of Frederick County, State of Maryland, by Edwin F. Nikirk, their solicitor, respectfully shows:

FIRST: That on the eleventh day of April, 1949, James H. Falk, County Treasurer for Frederick County, Maryland, and collector of taxes for the State of Maryland, and for Frederick County, acting by and under the authority of said office, sold to the Complainants, John T. Carey and Eva V. Carey, his wife, at public auction, for the sum of Seventy-five Dollars (\$75.00), all those lots or parcels of land known as Lots Number 88, 104 and 109, in New Addition, Brunswick, Maryland, and assessed to Harry K. Beachley and Frank C. Beachley, on account of State and County taxes then due and in arrears levied against said property.

SECOND: That on the eleventh day of April, 1949, your Complainants, John T. Carey and Eva V. Carey, his wife, paid to the said James H. Falk, County Treasurer aforesaid, the sum of Seventh-five Dollars (\$75.00) as appears by the Certificate of Sale executed and issued by the said James H. Falk, County Treasurer aforesaid, and dated the eleventh day of April, 1949; the said certificate of sale being filed herewith and being marked Complainant's Exhibit One and prayed to be taken as part hereof.

THIRD: That the said property hereinabove referred to has not been redeemed by any party in interest although more than one year from the date of sale on April 11, 1949, has expired.